

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CLEMENT WOGHIREN,

Plaintiff,

V.

WYETH, and

WYETH BIOPHARMA,

Defendants.

CIVIL ACTION NO. 04-12148-WGY

PROPOSED PRETRIAL SCHEDULE

Plaintiff Clement Woghiren and Defendants Wyeth and Wyeth Biopharma (collectively “Wyeth” or the “Defendants”) having by their counsel conferred pursuant to Fed.R.Civ.P. 26(f) and Local Rule 16.1 hereby submit the following proposed pretrial schedule to the Court and request that the Court enter an order adopting the schedule.

1. The parties shall make their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) by no later than December 31, 2004;
2. All written discovery (i.e. requests for admission, interrogatories and requests for production of documents) shall be served and answered by no later than April 1, 2005;
3. All depositions shall be completed by June 3, 2005;
4. All expert discovery shall be completed by or before June 17, 2005
4. All dispositive motions shall be filed by July 8, 2005; and,
5. Pre-trial conference shall be scheduled for August 26, 2005 or as soon thereafter as the Court's schedule permits.

The parties shall file separate certifications regarding alternative dispute resolution pursuant to Local Rule 16.1(D)(3).

Respectfully Submitted,

WYETH and WYETH BIOPHARMA,

By their Attorneys:

/S/

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Dated: December 6, 2004

Respectfully Submitted,

CLEMENT WOGHIREN,

By his Attorneys:

/S/

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